

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

THOMSON REUTERS ENTERPRISE)	
CENTRE GMBH and WEST PUBLISHING)	
CORPORATION,)	C.A. No. 20-613-SB
)	
Plaintiffs/Counterdefendants,)	JURY TRIAL DEMANDED
)	
v.)	
)	PUBLIC VERSION
ROSS INTELLIGENCE INC.,)	
)	
Defendants/Counterclaimant.)	

**SUPPLEMENTAL DECLARATION OF JIMOH OVBIAGELE IN SUPPORT OF
DEFENDANT/COUNTERCLAIMANT ROSS INTELLIGENCE INC.'S OPPOSITION
TO PLAINTIFFS/COUNTERDEFENDANTS THOMSON REUTERS ENTERPRISE
CENTRE GMBH AND WEST PUBLISHING CORP.'S MOTION FOR PARTIAL
SUMMARY JUDGMENT ON COPYRIGHT INFRINGEMENT**

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Defendant, Counterclaimant.)	

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I, Jimoh Ovbiagele, declare as follows:

1. I submit this Declaration in support of Defendant/Counterclaimant ROSS Intelligence Inc.'s ("ROSS") Opposition to Plaintiffs/Counterdefendants Thomson Reuters Enterprise Centre GmbH and West Publishing Corp.'s ("Plaintiffs") Motion for Partial Summary Judgment on Copyright Infringement. I have personal knowledge of the facts set forth below and, if called to testify, I could and would testify competently to the below.

2. I was the Chief Technology Officer and co-founder of ROSS until December 2020, and currently am the Board Director of ROSS. I was responsible for the creation of the ROSS legal search engine.

3. For purposes of this declaration, the opinions I have reached are based on my education, experience, training, testing, and tenure at ROSS.

I.

4. As part of ROSS's business efforts, ROSS experimented with different types of technologies. Some of those technologies were ultimately never integrated into the platform that was offered to customers because the experiments did not produce desired results.

5. For one of these experiments, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6. After completing experiments on this hypothesis, [REDACTED]

[REDACTED]

7. Thus, [REDACTED]

[REDACTED]

II. Plaintiffs' Exhibits 57 and 61

8. I understand that as part of Plaintiffs' Motion for Partial Summary Judgment on Copyright Infringement, Plaintiffs discuss two exhibits that it refers to as exhibits 57 and 61. I understand that these exhibits were produced by ROSS as part of the discovery process in this case and that these documents bear the Bates Nos. (respectively) ROSS-003419784 and ROSS-003658597.

9. I have personal knowledge about the contents of these documents, when these documents were created, and the purpose for which these documents were created.

10. Both of these documents were created in relation to the [REDACTED] that I described above.

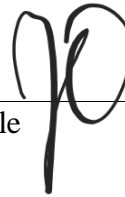
11. These documents do not relate to any technology that was integrated into the platform ultimately offered to customers. They do not relate to the bulk memo project.

12. These documents do not relate to any efforts to develop the machine learning technology that was actually integrated into the platform ultimately offered to customers.

13. These documents, in short, do not relate to actually creating the ROSS platform.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed at Toronto, Canada on this 28th day of January, 2023.

Jimoh Ovbiagele

A handwritten signature in black ink, consisting of a stylized 'J' and 'O' followed by a vertical line.